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**Via: ECF**

The Honorable Sarah Netburn  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 430  
New York, NY 10007

*Re: In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GDB)(SN)*

Dear Judge Netburn:

Our office represents the Plaintiffs in the following four matters: *Luis Aguilar, et al. v. Kingdom of Saudi Arabia, et al.*, 16-cv-09663; *Caron Addesso, et al. v. Kingdom of Saudi Arabia, et al.*, 16-cv-09937; *Miriam Hodges, et al. v. Kingdom of Saudi Arabia, et al.*, 17-cv-00117; and *Timothy Aiken, et al. v. Kingdom of Saudi Arabia, et al.*, 17-cv-00450. As directed by the Court in its March 24, 2017 Scheduling Order, please consider this letter as an update on the status of our office's service issues with the non-sovereign defendants.

We have been communicating with counsel for the Non-Sovereign defendants and are optimistic that an agreement will soon be reached with respect to service of process. Some Defendants' counsel have indicated that they are still waiting for authorization from their clients to agree to waive service and some Defendants' counsel have indicated that they will agree to waive service once the parties have an agreement concerning the timeframe to amend complaints, file motions to dismiss, and the preservation of jurisdictional defenses. Counsel for Defendant World Assembly of Muslim Youth has not agreed to waive service but has identified an individual authorized to accept service in Saudi Arabia. We believe that an agreement concerning all of these issues will be resolved amicably and momentarily.

Additionally, our office is also communicating with the Plaintiffs' Executive Committee on a procedure to adopt their Consolidated Amended Complaint against the Kingdom of Saudi Arabia. We agree with the proposal for adopting the Consolidated Amended Complaint against the Kingdom of Saudi Arabia that was submitted to the Court yesterday by the Plaintiffs' Executive Committee. However, these discussions are ongoing with respect to the possibility of adopting prior filed complaints against the Non-Sovereign defendants if necessary.

Our office is available to discuss any of these issues if the Court desires at its convenience.

Respectfully submitted,

Christopher LoPalo